

# SWIDLER BERLIN<sup>LLP</sup>

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May 10, 2005

## **VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Meeting Notice of Primus Telecommunications, Inc.  
IP-Enabled Services Rulemaking, WC Docket No. 04-36**

Dear Ms. Dortch:

Primus Telecommunications, Inc. ("Primus " or "Company"), by its undersigned counsel and pursuant to Section 1.106 of the Commission's Rules, 47 C.F.R. 1.106, hereby notifies the Commission that on May 9, 2005, Walter Stone, General Counsel, Geoffrey Hicks, Senior Vice President of Network Services, and Kathleen Lawrence, Assistant General Counsel from Primus and Catherine Wang from Swidler Berlin, LLP, outside counsel to Primus, met with Dan Gonzalez, Chief of Staff, and Michelle Carey, Legal Advisor in the Office of Chairman Kevin Martin to discuss Voice Over Internet Protocol ("VoIP") and 911 services. In particular, Primus described its Lingo VoIP product, the fact that it is largely used for international services over a broadband connection, and the nomadic use made by the Company's Lingo customers. We also discussed the Company's offering of emergency services, to the extent currently available, through a third party and Primus's robust descriptions to customers of the specific parameters of the currently available emergency services.

Primus recognizes the importance of examining 911 services and customer need and expectations for such services. Primus urged the Commission staff to keep in mind that there are many outstanding complex technical issues and practical barriers that need to be addressed before meaningful 911 solutions can be developed and implemented by VoIP providers. Further, there are many varieties of VoIP services, with different customer uses and customer expectations with respect to emergency services. Primus asked the Commission staff to consider the special issues associated with international VoIP services. The nature and scope of 911 obligations that may apply to these various VoIP services and technologies needs to be examined. VoIP providers do not currently have access to the network and database resources that are used in traditional 911 services. No entity currently offers a workable 911 solution for nomadic VoIP services.

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The record on these issues is still developing. The Commission and industry require adequate time to address the many challenging technical, practical and definitional issues surrounding VoIP 911, generally, and nomadic VoIP services, in particular.

If you have any questions regarding these filing, please do not hesitate to contact the undersigned.

Sincerely,

/s/

Catherine Wang

cc: Dan Gonzalez (FCC)  
Michelle Carey (FCC)  
Walter Stone (Primus)